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United States Attorney

District of Oregon

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Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT**  
**FOR THE DISTRICT OF OREGON**  
**PORTLAND DIVISION**

**UNITED STATES OF AMERICA,**

Civil No.

**Plaintiff,**

**COMPLAINT**  
Claim for Debt

v.

**YEN-DONG HO-TIBAYAN, MD,**

**Defendant.**

Plaintiff, United States of America, acting herein by the United States Attorney for the District of Oregon, complains and alleges:

1. That this action is brought by the United States of America, with jurisdiction provided by 28 U.S.C. Section 1345.
2. That the defendant, Yen-Dong Ho-Tibayan, MD, is a resident of the State of Oregon within the Court's jurisdiction.


3. That the defendant is indebted to the plaintiff in the principal amount of \$51,036.00, plus interest on this principal computed at the rate of 11 percent per annum in the amount of \$31,699.65 as of February 21, 2015, and interest continuing thereafter on this principal at the rate of 11 percent annum, until the date of judgment. See Exhibit "A" attached hereto and incorporated herein.

4. Demand has been made upon the defendant by the plaintiff for the sum due but the amount due remains unpaid.

Wherefore, the plaintiff prays judgment against the defendant for the total of \$82,735.65, inclusive of interest of \$31,699.65 at 11 percent per annum on the principal of \$51,036.00 which has accrued as of February 21, 2015, and will continue to accrue until date of judgment. Plaintiff further demands, pursuant to 28 U.S.C., Section 1961, that interest on the judgment be at the legal rate until paid in full.

Dated this 14 day of May, 2015.

S. AMANDA MARSHALL  
United States Attorney  
District of Oregon

  
KATHLEEN L. BICKERS  
Assistant United States Attorney